BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE (OCA/USPS—91)

The United States Postal Service hereby provides a response to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS—91, filed on March 16, 2000.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Kenneth Hollies

1 2 Heller

Attorney

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RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-91. Please provide a breakdown of volume for FYs 1998 and 1999 by category of mail by ODIS exit mode. Please reconcile the volumes in LR-I-95, file LR95del.xls, tab Delivery Volumes with the 1998 ODIS volumes.

RESPONSE:

The ODIS exit mode computations referred to in the interrogatory can no longer be computed. In FY 98 and FY 99, the ODIS sampling frame is stratified by "Mail Exit Point", rather than the earlier definition of "Final Delivery Unit." The old definition was in terms of box sections, city routes, etc., and volume could be estimated by these stratification criteria. Mail exit points, however, are larger aggregations of mail such as "all flats exiting a post office."

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Kenneth Hollies

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